

FILED

AUG - 8 2017

CLERK, U.S. DISTRICT COURT
By _____
Deputy *[Signature]*

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO.

3-17 CR-414-N

KAMYAR JAHANRAKHSAN
also known as KAMYAR JAHAN RAKHSHAN;
ANDY or ANDREW RAKHSHAN; ANDY or
ANDREW KAMYAR (or KAMIAR or KAMIER)
RAKHSHAN

The Grand Jury Charges:

INDICTMENT

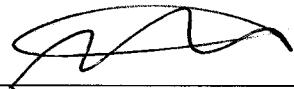
Count One

Knowingly Causing the Transmission of a Command to a Protected Computer
(18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)))

Between on or about December 30, 2014, and on or about January 25, 2015, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Kamyar Jahanrakhshan, also known as Kamyar Jahan Rakhshan; Andy or Andrew Rakhshan; Andy or Andrew Kamyar (or Kamiar or Kamier) Rakhshan** knowingly caused the transmission of a program, information, code, and command, and, as a result of such conduct, intentionally caused damage without authorization to a protected computer; in that the defendant knowingly caused a denial of service attack on the website Leagle.com, and by said transmission caused a loss aggregating at least \$5,000 or more during a one-year period.

In violation of 18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B)).

A TRUE BILL:



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



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KAMYAR JAHAN RAKHSHAN
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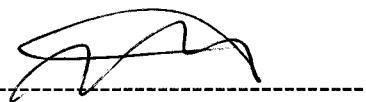
INDICTMENT

18 U.S.C. § 1030(a)(5)(A) (18 U.S.C. § 1030(c)(4)(A)(i)(I) and (B))
Knowingly Causing the Transmission of a Command to a Protected Computer

1 Count

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 8th day of August, 2017.

Defendant in Federal Custody since
July 26, 2017 Seattle, Washington



UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:16-MJ-635-BK